

From	To
"Kustic, Tim@DOC" <Tim.Kustic@conservation.ca.gov>	David Albright/R9/USEPA/US@EPA
CC	BCC
"Turner, Justin@DOC" <Justin.Turner@conservation.ca.gov>	
Subject	Date/Time
FW: District Approval of EOR "Accretion" Projects Without Aquifer Exemptions	01/24/2013 02:22 PM

Item Body

David,

I wanted to share this legal interpretation with you. We are not in agreement with Mr. Candy.

If you want to discuss this topic, let me know.

I look forward to our February meeting. Tim

From: Peter Candy [mailto:pcandy@hbsb.com]

Sent: Friday, January 11, 2013 4:47 PM

To: Kustic, Tim@DOC

Cc: Pierce, James@DOC; Turner, Justin@DOC; Salera, Jerry@DOC; Wermiel, Dan@DOC; Ellison, Burt@DOC

Subject: District Approval of EOR "Accretion" Projects Without Aquifer Exemptions

Hello Tim,

Per my conversation with Justin Turner this past Tuesday, I'm forwarding you and your staff a substantially revised version of the previous letter I sent to Jerry Salera on December 20, 2012, concerning legal authority supporting District approval of EOR "accretion" or "step-out" projects without requiring aquifer exemptions. The attached letter I believe does a much better job identifying and articulating the key issues which I'd like the Division to consider. If you have any questions regarding the foregoing, or desire further clarification on a particular issue,

please do not hesitate to call. Otherwise, I look forward to hearing the Division's thoughts and comments.

Best regards,

Peter L. Candy

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